

REMARKS

Applicant hereby replies to the Final Office Action dated May 13, 2005 in the above-referenced patent application. Claims 1-36 are pending in the patent application (Claims 21-33 were withdrawn from consideration). Claims 1, 3-20 were rejected. Claims 34-36 were allowed, and Claim 2 was deemed allowable if rewritten in independent form including limitations of base claim and any intervening claims. Applicant wishes to thank the Examiner for detailing the allowed and allowable claims.

Claims 1, 3-4, 6 and 8 were rejected under 35 USC 103(a) as being unpatentable over USPN 5,956,487 to Venkatraman et al. (hereinafter "Venkatraman") in view of USPN 6,148,346 to Hanson. Claims 5 and 7 were rejected under 35 USC 103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 1 above, and further in view of USPN 5,938,726 to Reber et al. (hereinafter "Reber"). Further, Claims 9-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 1, and further in view of Suzuki et al., Teleoperation of multiple robots through the Internet, 5th IEEE International Workshop on Robot and Human Communications, November 11-14, 1996, pages 84-89 (hereinafter "Suzuki"). And, Claims 16-20 were rejected under 35 USC 103(a) as being unpatentable over Venkatraman in view of Hanson and further in view of Suzuki.

Claim Rejections under 35 USC §103(a)

Rejection of Claims 1-4, 6 and 8 under §103(a) as being unpatentable over Venkatraman in view of Hanson is respectfully traversed because the claims include limitations not taught or suggested by the cited references alone, or in combination. In Venkatraman, Web access functionality is embedded in a device in the form of a web server, to enable accessible user interface functions for the device through a device web page. A user can access the device using a web browser the displays the device web page.

Hanson is directed to a data communication system for allowing communication between various devices and various operating systems across various types of networking systems. The data communication system includes a host computer system 10 with a display device 15 and a processor 17 for generating signals for the display device, at least one peripheral device 56, and a dynamic device driver 42 for allowing two-way communication between the peripheral device and the host computer system. The dynamic device driver includes an operating system specific portion 33, configured for the operating system of the host computer system, and an operating system independent device driver portion 34, configured for the peripheral device. The operating system includes a linking mechanism 19 for allowing two-way communication between the operating system specific portion and the operating system independent device driver portion, thus allowing two-way communication between the processor and the peripheral device (Abstract).

As to **Claim 1**, it is respectfully submitted that Venkatraman and Hanson, alone or in combination, do not disclose the required limitations in Claim 1. In Venkatraman (Fig. 1a) a device 10 includes a web server 14 that allows access to the device 10 by a web browser 40 (Fig. 2) through a web page 18. A monitor 16 controls device specific function of the device 10 only (col. 3, lines 5-36).

There is no device list file in Venkatraman

Venkatraman does not disclose generating a device list file in an autonomous and dynamic manner to identify home devices that are currently connected to the home network, as required by Claim 1. Venkatraman only discloses providing access to device 10 from the external web browser 40. There is no device list file in Venkatraman. Venkatraman works if the browser 40 previously knew about the device 10. If the device 10 is no longer connected, the browser 40 would not know about that dynamically or autonomously.

There is no autonomous and dynamic list file generation in Venkatraman

Venkatraman mentions employing web technology so that access to a device user interface is independent of the computer system platform employed and independent of the web browser software executed and independent of the location of the user (col. 2, lines 36-42), and that the web server 14 generates the web page 18 dynamically to reflect the updated state of the information pertaining to the device 10 that is maintained by the monitor 16 (col. 3, lines 33-36).

The Patent Office interprets the above to mean that Venkatraman teaches dynamic and autonomous generation. However, the web page 18 of a device 10 in Venkatraman maybe generated and provided only in response to user request from the browser 40, not autonomously, as claimed herein. Venkatraman specifically states: “In response to an HTTP command targeted for the device 10, the web server 14 generates a web page 18 that defines a set of user interface functions for the device 10.... The network interface 12 transfers the web page 18 to a requesting HTTP client via the communication path 22” (col. 3, lines 27-32, emphasis added). Therefore, Venkatraman does not teach an autonomous generation process as claimed herein.

In col. 3, lines 33-36, Venkatraman simply states that the web server 14 generates the web page 18 dynamically to reflect the updated state of the information pertaining to the device 10 that is maintained by the monitor 16. However, this is not generating a device list file in an autonomous and dynamic manner, wherein the device list file identifies home devices that are currently connected to the home network, as claimed. The web server 14 reflects updated status of the information for the device 10 only, and no other device. Further, a dynamic update status of the device 10 is not the same as autonomous and dynamic generation of a device list file that identifies home devices that are currently connected to the home network, as claimed.

Venkatraman teaches away from the claimed invention

In col. 7, lines 36-46, Venkatraman teaches away from Applicants’ claimed invention by requiring that the user of one of the computer systems 90-92 enters a URL corresponding to the

desired one of the devices 10 and 50-52 into the corresponding web browser application. In response, the particular web browser application as an HTTP client transfers an HTTP command that specifies the desired URL over the large organization network 80. The device specified by the HTTP command recognizes the URL contained therein. In response, the targeted device transfers an HTML file that defines its device web page via large organization network 80.

Therefore, Venkatraman does not teach an autonomous and dynamic process as claimed herein. A user must enter the device URLs, and receiving a URL from a home device is not even taught or suggested by Venkatraman. There is no need for features of the claimed invention in Venkatraman because Venkatraman simply for embedding Web access functionality in one device to enable accessible user interface functions for the device.

Hanson and Venkatraman do not disclose the claimed limitations.

The Patent Office contends that Hanson (Fig. 5, col. 5, lines 36-40) discloses generating a device list file wherein the device list file identifies home devices that are currently connected to the home network. Then, the Patent Office contends that Venkatraman (col. 2, lines 36-42 and col. 3, lines 33-36) discloses the limitation of in an autonomous and dynamic manner. The Patent Office then concludes Venkatraman and Hanson discloses generating a device list file in an autonomous and dynamic manner, wherein the device list file identifies home devices that are currently connected to the home network, as required by Claim 1.

The GUI list in Fig. 5 of Hanson (relied on by the Examiner), is a list of features for printers, provided to help the user select which printer to use. The list of features include printer emulation, resolution, print speed, paper and envelope sizes, comments or additional printer features (col. 5, lines 36-40). Hanson does not disclose autonomously and dynamically generating such a list. The Patent Office states that Venkatraman teaches creating a device link page including graphical or textual representations of corresponding devices. However, in Venkatraman there is no mention, whatsoever, of a device list file or a device link page as claimed, or the limitation of: “creating a device link page, wherein the device link page contains at least one graphical or textual representation of corresponding devices that are identified in the device list file,” as required by Claim 1. The browser 40 is not displaying a link page or list of devices, rather the web page (i.e., user interface) of one device 10, which is a printer in the example of Fig. 3. Venkatraman states that the browser 40 accesses the functions of the one device 10 at a URL provided by a user, and displays such user interface information for the printer device 10 (i.e., printer name, administrator, location, etc.). There is no list of devices displayed on the browser 40.

The Patent Office states that, Venkatraman teaches the claimed limitation of associating a hyper-text link with each device representation. However, Venkatraman states that a web server 14 in a device 10 generates a web page 18 that defines a set of user interface functions for the device 10. The web server 14 generates the web page 18 to reflect the updated state of the information pertaining to the device 10 that is maintained by a monitor 16. The web page 18 may also define control buttons according to the HTTP protocol that enable various

control functions for the device 10 to be initiated from a web client via a communication path (Col. 3, lines 16-18, 27-29, 33-40). Further, a browser 40 accesses a user interface function of a device 10 at a URL provided by a user, and displays such web page 18 (Fig. 3, col. 5, lines 29-42). Venkatraman's teaching of the web browser 40 accessing and displaying the web page 18 created by the web server 14 in a device 10, does not teach or suggest the claimed limitation of "associating a hyper-text link with each device representation" or the limitation of "the hyper-text link provides a link to a web page that is contained in the device that is associated with the device representation" (Claim 1).

In col. 5, lines 36-42, relied upon by the Patent Office, Venkatraman specifically states: "The web browser 40 includes a display 42 for generating visual objects including text, images, multimedia objects, and graphical user interface objects. The web browser 40 includes a selection device 44 that enables a user to select objects and URL links rendered on the display 42. The web browser 40 may also include an audio capability that enables rendering of audio information to the user" (col. 5, lines 36-42). As such, the links mentioned in Venkatraman are not associated with device representations in a link page, as claimed. The selection device 44 in Venkatraman simply: "enables a user to select objects and URL links rendered on the display 42". There is no mention that that links in Venkatraman are hyper-text links associated with representations of devices in a network (such as multiple devices 10), wherein each "hyper-text link provides a link to a web page that is contained in the device that is associated with the device representation," as claimed. Applicant respectfully requests that the Patent Office specifically point out where the claimed limitations are taught or suggested in Venkatraman.

The Patent Office states that Venkatraman, Fig. 3, teaches display of device information on a network browser, and that this is the same as “displaying the device link page on a browser based device,” as claimed. However, as detailed above, in Fig. 3, the browser 40 is not displaying a link page or list of devices, rather the web page (i.e., user interface) of the one device 10, which is a printer in the example of Fig. 3. Venkatraman states that the browser 40 accesses the functions of the one device 10 at a URL provided by a user, and displays such user interface information for the printer device 10 (i.e., printer name, administrator, location, etc.). There is no list of devices displayed on the browser 40.

Further, each reference itself must suggest a modification or combination proposed in order for the modification or combination to be valid; “[the] invention cannot be found obvious unless there was some explicit teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention.” *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). “The prior art must provide one of ordinary skill in the art the motivation to make the proposed molecular modifications needed to arrive at the claimed compound.” *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). There is no suggestion from either reference that they be combined or modified as proposed by the Office Action and, in fact, even the Office Action fails to provide the necessary impetus for the modification. In addition, as illustrated through more detailed examples below, the references teach away from Applicant’s claimed invention and do not provide any suggestion for their combination or modification.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 1, and dependent claims therefrom, because the combination and modification of the references is improper and does not disclose all the limitations of Applicants' claimed invention.

As to **Claims 3-4**, Applicants respectfully assert that since Claims 3-4 incorporate the novel and unobvious limitations of Claim 1, they are therefore allowable due to at least the reasons set forth above in relation to the rejection of Claim 1, as well as for their own novel sub-features. Venkatraman does not teach or suggest a generating link page as claimed. Venkatraman does not teach retrieving a logical name stored in a device list file, as well as icons. Despite the Patent Office's statement, neither Venkatraman nor Hanson, alone or in combination, teach or suggest that a device list file includes logical device names, wherein each logical device name is obtained by autonomously detecting that a device is connected to the network, and associating a logical device name with that device. By contrast, as discussed above, the GUI list in Fig. 5 of Hanson relied upon by the Patent Office, is nothing more than a list of features for printers, provided to help the user select which printer to use. The references, alone or in combination, do not disclose creating the device link page by retrieving a logical device name from the device list file, storing the logical device name in the device link page, and converting the logical device name to a device button (Claim 3). The references, alone or in combination, do not disclose creating the device link page by retrieving a device ICON image from a home device, creating a device button based on the device ICON image, and storing the device button in the device link page.

Further, as set forth in greater detail above, the reference itself must suggest the modification or combination proposed in order for the modification or combination to be valid. There is no suggestion or motivation from either reference that they be combined or modified as proposed by the Office Action and, in fact, even the Office Action fails to provide the necessary impetus for the modification. In addition, as illustrated through more detailed examples below, the references teach away from Applicant's claimed invention and do not provide any suggestion for their combination or modification.

Therefore, Applicants respectfully request withdrawal of the rejection of Claims 3-4 because the combination and modification of the references is improper and does not disclose all the limitations of Applicants' claimed invention and because the rejection thereof does not comply with the requirements set forth in the MPEP. As such, rejection of claims 3-4 should be withdrawn.

As to **Claim 6**, the Office Action rejected Claim 6 under 35 USC 103(a) as being unpatentable over Venkatraman. Applicants incorporate herein the remarks above set forth as to the novelty and unobviousness of Claim 1. In addition, the Office Action acknowledges that Venkatraman fails to teach all of the limitations of Applicants' invention and the rejection of Claim 6 under 35 USC 103(a) is therefore improper. For a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion thereof. Venkatraman fails to suggest any combination or modification thereof and in fact the Office Action fails to modify the same or provide a suggestion or motivation thereof.

Further, Venkatraman does not show all of the limitations of Applicants' claimed invention. In fact, Venkatraman teaches away from Applicants' claimed invention by requiring that "A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into the corresponding web browser application." (Venkatraman, Col. 7, lines 36-38). Conversely, the claimed invention provides a session manager that determines the location and availability of the devices connected to the network in a dynamic fashion. Accordingly, even if the combination were legally justified, it would not teach all of the limitations of Applicants' claimed invention because the method of receiving a URL from a home device is admittedly not taught by Venkatraman. A previous Office Action admits that Applicants' method of providing a URL associated with the device provides increased information selectivity. However, the Patent Office then attempts to improperly modify Venkatraman to achieve the advantages of Applicants' claimed invention. Applicants respectfully submit that the fact the modification produces admitted advantages militates in favor of the patentability of Applicants' claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 6 because the modification of the reference is improper.

As to **Claims 5 and 7**, the rejection of these claims under 35 USC 103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 1, and further in view of Reber, is respectfully traversed. Applicants also respectfully traverse the rejection and the modification and combination of Venkatraman, Hanson and Reber. Applicants incorporate herein the remarks

set forth above in response to the rejection of Claim 1 that clearly illustrates the novel and unobvious aspects of the claim over the references cited. As a result of the dependence of Claims 5 and 7 from Claim 1, Applicants respectfully assert that Claims 5 and 7 are in turn allowable.

Further, it is well settled that for a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion for the asserted modification. Applicants respectfully traverse the proposed combination and modification. Reber teaches advertising on a first web page by displaying a logo of a sponsor that is linked to the web page of the sponsor. Accordingly, because the user is already on the first web page, there would be no reason or motivation for Reber to provide a logo of the first web page that links to itself. In addition, because Venkatraman already accesses the web page of the device to download information therefrom, there would be no reason to provide a logo to do so. Furthermore, because Hanson teaches providing a control mechanism for a printer accessed through a URL, there would be no reason to provide a logo for an alternate printer. Therefore, because of the diverse functioning of the references, there would be no motivation for the combination thereof to provide a LOGO as claimed by Applicants.

The Office Action seems to recognize the advantages of the presently claimed invention by trying to make “hind-sight” modifications to the references to achieve the claimed invention. The Office Action acknowledges that Applicants’ LOGO provides increased device recognition and attempts to improperly combine divergent references to achieve the advantages of

Applicants' claimed invention. Applicants respectfully submit that the fact the modification produces advantages in increasing device recognition by using a LOGO militates in favor of the patentability of Applicants' claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious.

Therefore, Applicants respectfully request withdrawal of the rejection of Claims 5 and 7 because the combination and modification of the references is improper and does not disclose all of the claimed limitations thereof.

As to **Claims 9-11**, rejection of these claims under 35 U.S.C. 103(a) as being unpatentable over Venkatraman and Hanson as applied to Claim 1, and further in view of Suzuki, is respectfully traversed. For the reasons provided above in relation to Claim 1, Venkatraman and Hanson do not disclose the limitation of Claims 9-11. Further, as the Patent Office also states, Venkatraman does not disclose updating device list files as connected and/or disconnected. However, the Patent Office states that Suzuki discloses such limitations (page 87, left column, item 8, and also page 88 section 5.3) by mentioning that the system notes which robots do not respond to calls. Applicant respectfully disagrees.

Indeed, Suzuki, is directed to a human interface system for multi-robot teleoperation using the WWW system wherein a single operator operates all of the robots simultaneously (page 84, col. 2, section 2, lines 1-3). Suzuki does not disclose updating device list files as connected and/or disconnected as claimed. Nowhere does Suzuki teach or suggest the step of

detecting robots that are currently connected to the LAN. If a call is made to a robot, and the robot does not respond, it does not mean that the connecting of a robot to the network is detected, or that a list file is generated by dynamically and autonomously updating the device list file as devices are connected to, and/or disconnected from, the home network. Suzuki does not disclose dynamic and autonomous detection of connection and/or disconnection of robots to a network. If a call is made to a robot to perform a task, it necessarily means that the robot is already recognized as connected. Otherwise, why would a call be made to it? However, Suzuki does not disclose that connection/disconnection of a robot is autonomously and dynamically detected to then update a list file, as claimed.

Suzuki provides an architecture for a human interface system which has five modules and two data bases (Figs. 1 and 3). The five modules are a Presentation Interface Module that accepts commands given by the operator and shows the condition of the system, a Monitoring Module that gathers information in the system for monitoring purposes, a Dialog Module that is responsible for coordinating message exchange between the operator and the robots, an Operation Module that interprets commands into readable formats, and a Communication Module that converts information from other modules into uniform protocol among robots (page 85, right column). Suzuki describes the operation of the five modules in Fig. 3 and eight steps in Section 5.1 on pages 86 and 87. In Step 1 a WWW server receives task commands from an operator, in Step 2 the WWW server invokes the Operation Module, in Step 3 the Operation Module consults an operation database and determines necessary facilities and operations for the given task and allocates robots available for the task, in Step 4 the Communication Module

transmits commands to the available robots to perform the requested task, in Step 5 the available robots reply to the task request and the Operation Module negotiates with those robots through the Communication Module to specify the robots that execute the task, in Step 6 after the robots complete the tasks they send status data to the Monitoring Module through the Communication Module, in Step 7 the Monitoring Module saves that data and provides that data to the WWW server, and finally in Step 8 the WWW server presents that data in the Presentation Interface Module for the operator. Suzuki does not mention anywhere that connection/disconnection of robots are autonomously and dynamically detected. For example, that a robot is or is not available, or does or does not respond to a call, does not mean autonomous and dynamic detection of connection/disconnection of the robot to generate a list file of robots.

Suzuki specifically states: “The human interface system must coordinate tasks and organize robots”, not the operators (Section 5.2, page 87, first paragraph). Though the robots are uniquely identified (e.g., “***CmCd01*” representing “omni directional robot No. 1 which has CCD camera and can carry out the task using camera”), the operator does not select a specific robot from a menu to perform an observation task. Rather, the operator specifies an observation task with a command “***Cm*****” which generally represents all robots, and then the Operation Module selects a specific robot with a camera to perform the observation task. The Operation Module coordinates tasks or robot organization using the robot IDs (Suzuki, 5.2, pages 87 and 88, Section 5.3). This is further made clear by the example observation operation in Section 5.3 on page 88 of Suzuki. Suzuki does not teach the step of detecting robots on the network.

Clearly then, Suzuki does not teach the step of autonomously and dynamically detecting devices currently connected to the home network to update a list file of the detected devices.

Suzuki's human interface system for teleoperating multiple robots connected to a LAN, has nothing to do with a method for providing an interface for accessing devices that are currently connected to a home network, as claimed. Suzuki is non-analogous art. A room in a plant with robots in it, has nothing to do with a home network with devices connected thereto. The Patent Office is reading limitations into Suzuki that are not supported by Suzuki. There is no mention of a home, a room in a home, a LAN in a home, robots in a home or robots in a room in a home. Teachings of Suzuki cannot be applied to a home network for the reasons given above. If Claims 9-11 are once again rejected, Applicant respectfully requests that the Patent Office specifically point to limitations of Claims 9-11. As such, it is respectfully submitted that rejection of Claims 9-11, and all claims dependent therefrom should be withdrawn.

As to **Claim 12**, this Claim adds further limitation to Claim 1, not disclosed by the references. Further, as detailed above, Venkatraman does not disclose generating a device list file, or autonomously determining the network location and availability of the devices that are connected to the home network. Further, Suzuki does not disclose autonomously determining the network location and availability of robots connected to the network. Indeed, nowhere in Suzuki is an autonomous determination of location or availability of devices is made. As discussed, only after a task is specified, does Suzuki go about allocating robots to perform the task. For at least these reasons, rejection of Claim 12 should be withdrawn.

As to Claims 13-15, these claims were rejected for substantially the same reasons as Claims 9-11. As such, for at least the reasons provided above in relation to Claims 9-11, rejection of Claims 13-15 should be withdrawn.

As to **Claims 16-20**, rejection of these claims under 35 USC 103(a) as being unpatentable over Venkatraman in view of Hanson and further in view of Suzuki, is respectfully traversed. As to Claim 16, as discussed in relation to Claim 1, Venkatraman and Hanson do not disclose generating a device list file in an autonomous and dynamic manner. Further, Venkatraman and Hanson do not disclose generating the device list file in response to a detection of home devices that are currently connected to the home network. And, as the Patent Office states, Venkatraman does not disclose creating a menu page, the menu page containing at least one of a graphical and/or textual representations of said home devices that are currently connected to said home network, as claimed.

Nor does Suzuki teach a menu from which devices can be selected. The operator in Suzuki does not, and cannot, select an individual robot. Rather, the operator specifies a task (“observing an object”), but does not select a specific robot from a menu for that task. Rather, the Operation Module in Step 3 above negotiates with the robots and selects the robots that can perform the task. The operator cannot select robots for a task because it would put Suzuki’s system of simultaneous multi-robot operation into chaos. The Operation Module is a task manager that manages the robots to perform the operator requested task and ensures their cooperative operation. This is important since multiple operators (Fig. 2) can request tasks to be

performed by the limited number of robots and the Operation Module ensures that the different tasks get done by the available robots. Otherwise, without the Operation Module, if multiple operators (see Fig. 3, multiple Presentation I/F Modules) selected the same robot for a task, there would be contention. Further, if multiple robots are selected by multiple operators without task scheduling and management by the Operation Module, the robots can physically collide into one another for example.

Suzuki specifically states: “The human interface system must coordinate tasks and organize robots”, not the operators (Section 5.2, page 87, first paragraph). Though the robots are uniquely identified (e.g., “**CmCd01” representing “omni directional robot No. 1 which has CCD camera and can carry out the task using camera”), the operator does not select a specific robot from a menu to perform an observation task. Rather, the operator specifies an observation task with a command “**Cm***” which generally represents all robots, and then the Operation Module selects a specific robot with a camera to perform the observation task. The Operation Module coordinates tasks or robot organization using the robot IDs (Suzuki, 5.2, pages 87 and 88, Section). This is further made clear by the example observation operation in Section 5.3 on page 88 of Suzuki.

As such, Suzuki does not disclose any menu or a menu for selection of robots, nor can Suzuki be modified to do so without making the human interface system of Suzuki totally inoperative. The inclusion of a menu in Suzuki for selecting specific robots goes against the teachings and purpose of the human interface system of Suzuki because according to Suzuki

“The human interface system must coordinate tasks and organize robots. The communication system and protocols have been developed to realize the communication between multi-robots. The organization strategies using the communication system have also developed to realize the cooperation among the robots. The communication between the human interface and multi-robots conforms with the communication strategies.” (Section 5.2, page 87, first paragraph). As such, rejection of Claim 16 should be withdrawn.

As to **Claim 17**, as discussed, Venkatraman does not display a menu page of devices connected to a network. Venkatraman displays web page 18 of one device 10, not a menu of devices. As such, rejection of Claim 17 should be withdrawn.

As to **Claim 18**, as the Patent Office also states, Venkatraman does not disclose retrieving an icon image file which contains graphical and/or textual representation of said home devices from said home devices. Nor does Hanson teach such limitations. Figs. 3-5 of Hanson, relied upon by the Patent Office, only show interactive menus and Hanson does not disclose that they come from the devices themselves. Further, Suzuki only mentions showing images seen by robot cameras, not images representing devices connected to the home network. As such, rejection of Claim 18 should be withdrawn.

As to **Claim 19**, this claims adds further limitations to allowable Claim 16, not disclosed by the references, and as such Claim 19 should be allowed.

As to **Claim 20**, this claim was rejected for substantially the same reasons as Claim 16, and as such for at least the reasons provided above in relation to Claim 16, rejection of Claim 20 should be withdrawn.

CONCLUSION

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 01-1960 for any additional fees required in connection with this filing. A duplicate copy of this page is enclosed for this purpose.

It is respectfully submitted that the case is now in condition for allowance, and an early notification of the same is requested. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

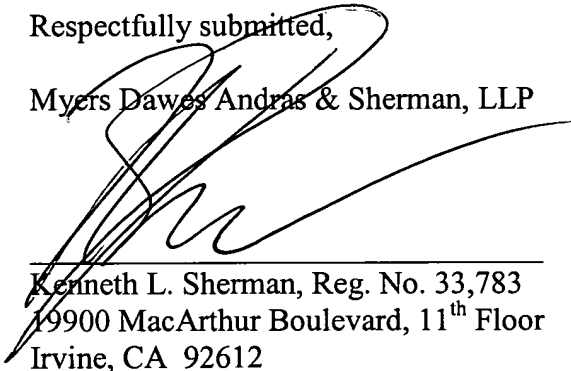
I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: MS AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on August 11, 2005.

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